ENTERCOM®

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December 23, 2009

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **MB Docket No. 07-294, Request for Relief**

Dear Ms. Dortch:

By this letter, Entercom Communications Corp. ("Entercom") is joining the request for relief made by counsel and legal assistants of various broadcasters and broadcaster associations ("Broadcast Counsel") in their Notice of Ex Parte and Request for Relief filed with the Commission on December 18, 2009 based on difficulties Entercom is experiencing in completing the new FCC Form 323 (the "New Form").

Entercom is the parent company of 23 broadcast licensees that hold 120 broadcast licenses. As such, Entercom is required to file 73 Biennial Ownership Reports on the New Form (each, a "Report") (1 Report for each broadcast licensee and 1 Report for each entity that holds a direct attributable interest in each broadcast licensee). The first Report Entercom attempted to complete on the New Form was for one of Entercom's broadcast licensees that holds 3 broadcast licenses ("Entity A"). Entity A has 7 officers, each of whom also has an attributable interest as an officer for Entercom's other 117 broadcast licenses, as well as the sole member of Entity A that holds a direct attributable interest in 97 of the other broadcast licenses. Each of these attributable interests has to be reported in Section II-A, Question 3(c) of the New Form on a separate subform by clicking on the "Save Last and Add Copy" button at the bottom of the screen after each entry. 916 subforms are required for Entity A's report alone. The wait time to load a new copy of the subform has increased exponentially from the time Entercom started to complete Entity A's Report. The wait time is now at approximately 6 minutes. Additionally, on numerous occasions the "Save Last and Add Copy" button does not load at all and the CDBS system freezes up for several minutes causing Entercom to re-log into the CDBS account and begin again. When this occurs, it takes approximately 20 minutes to load a new subform. To date, it has taken Entercom approximately 60 hours to complete only 75% of 1 Report out of 73 Reports since the New Form became publicly available on December 9, 2009. As of this morning, Entercom is completely unable to gain access to the New Form at all in the CDBS system.
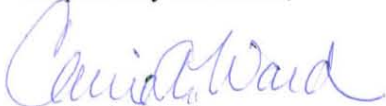
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It is of even more concern to Entercom that Entity A is one of Entercom's least complex entities required to file a Report. The most complex entity Entercom is required to file a Report for is the direct parent of 19 Entercom broadcast licensees and the indirect parent of the remaining 4 Entercom broadcast licensees ("Entity B"). Entity B has 18 officers, each of whom will have to include a subform for each officer's attributable interest in any other broadcast station. A separate Report for Entity B will have to be filed with each of Entercom's 23 broadcast licensees' Reports. The number of subforms required for each Entity B Report will vary depending on which licensee the Entity B Report is being filed in connection with due to the number of broadcast licenses held by a particular licensee. For example, 2,106 subforms will be required for Entity B's Report filed in connection with Entity A's Report alone, which is more than two times the subforms required for Entity A. Completion of Entity B's Reports will clearly take an inordinate amount of time since it has already taken Entercom approximately 60 hours to complete only 75% of Entity A's Report.

For the reasons set forth above, Entercom respectfully requests that the Commission grant the relief requested by Broadcast Counsel in their Ex Parte Notice and Request for Relief submitted on December 18, 2009.

Respectfully submitted,

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